

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

KINGERY PRINTING COMPANY,)	
)	
Plaintiff,)	Case No.: 3:24-cv-2328-SPM
)	
vs.)	
)	
THE LAMPO GROUP, LLC a/k/a RAMSEY)	
SOLUTIONS,)	
)	
Defendant.)	

JOINT MOTION TO STAY PROCEEDINGS

Plaintiff Kingery Printing Company (“Kingery”) and Defendant The Lampo Group, LLC a/k/a Ramsey Solutions (“Ramsey Solutions”) (collectively, the “Parties”) respectfully request that this Court extend the stay of this action for 35 days (through and including March 10, 2025) so that the Parties implement a settlement. In support of this Motion, the Parties state as follows:

1. Kingery filed this action on September 13, 2024. Ramsey Solutions removed the action to this Court on October 16, 2024.
2. The Court has granted three extensions of time for Ramsey Solutions to file a responsive pleading in order to allow the Parties to explore the potential for a settlement. Ramsey Solutions’ responsive pleading currently is due February 3, 2025.
3. On November 18, 2024, the Parties reached a settlement in principle that will fully and finally resolve this dispute.
4. The Parties are in the process of memorializing the settlement and will then implement the settlement terms, which will include both a settlement payment and the transfer of approximately eight truckloads of materials between the Parties. While the Parties expect a

settlement agreement to be signed shortly, the Parties expect that it will take several weeks to implement all the settlement terms.

5. Accordingly, in order for the Parties to finalize and implement the settlement, the Parties jointly request that this Court stay this action for 35 days, through and including, March 10, 2025. If the settlement terms are carried out prior to that time, the Parties will file the necessary papers to dismiss this action, with prejudice.

6. In the unlikely event that the settlement agreement is not finalized and implemented by March 10, 2025, Ramsey Solutions will file its responsive pleading on or before March 17, 2025. Kingery then will have until on or before March 31, 2025, to file a Motion to Remand the matter, should it choose to file such a motion.

7. A temporary stay will not prejudice any party, as all parties are committed to finalizing a settlement that will resolve this matter.

WHEREFORE, the Parties respectfully request that this Court grant this Motion enter an order staying all proceedings in this action for 35 days, until March 10, 2025.

[SIGNATURE PAGE TO FOLLOW]

Dated: February 3, 2025

Respectfully submitted,

/s/ Chad E. Chojnicki

Chad E. Chojnicki

MCDEVITT OSTEEN CHOJNICKI & DETERS, LLC

127 West Jefferson Avenue, P.O. Box 507

Effingham, IL 62401

Phone: (217) 342-8080

Fax: (217) 342-8066

chad@mocdlaw.com

Counsel for Plaintiff Kingery Printing Company

/s/ Scott T. Schutte

Scott T. Schutte

Spenser B. Jaenichen

MORGAN, LEWIS & BOCKIUS LLP

110 North Wacker Drive, Suite 2800

Chicago, IL 60606-1511

Phone: 312.324.1000

Fax: 312.324.1001

scott.schutte@morganlewis.com

spenser.jaenichen@morganlewis.com

*Counsel for Defendant The Lampo Group, LLC
a/k/a Ramsey Solutions*

CERTIFICATE OF SERVICE

I, Scott T. Schutte, an attorney, certify that I filed the foregoing using the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record on this 3rd day of February, 2025.

/s/ Scott T. Schutte

Scott T. Schutte